

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

MAGGIE RUSSELL

PLAINTIFF

VS.

CIVIL ACTION NO. 1:22-cv-00086-TBM-RPM

MISSISSIPPI GULF COAST COMMUNITY
COLLEGE through its Board of Trustees
(in their official and individual capacities) and
DOES 1-20; inclusive

DEFENDANTS

JOINT MOTION FOR EXTENSION OF TIME

COMES NOW, Plaintiff, Maggie Russel, together with Defendant, Mississippi Gulf Coast Community College, by and through their respective counsel, and jointly move the Court for a 45-day extension of the deadline for the Telephonic Case Management Conference, and in support thereof would show unto the Court the following:

1. The Court entered the Rule16(a) Initial Order in the above referenced matter on June 28, 2022. The Rule16(a) Initial Order set the Telephonic Case Management Conference for August 2, 2022 at 10:00 AM.
2. Pursuant to the Rule16(a) Initial Order, on July 14, 2022, the parties met and conferred regarding the discovery matters set forth in Rule 26(f). During the parties' conference, the parties jointly agreed to participate in resolution efforts prior to the case management conference.
3. The Parties respectfully request a 45-day extension of the Telephonic Case Management Conference to allow the Parties to work toward a resolution of this matter.

WHEREFORE, the Parties, by and through their undersigned counsel, respectfully request that the Court grant this Joint Motion for Extension of Time, and for such other and further relief as is deemed proper in the premises.

RESPECTUFLY SUBMITTED, this the 21st day of July, 2022.

By Counsel

/s/ Kristi Rogers Brown

Kristi R. Brown, Esq.
Daniel Coker Horton and Bell, P.A.
1712 15th Street, Suite 400
Post Office Box 416
Gulfport, MS 39502-0416
kbrown@danielcoker.com

/s/ Hollis T. Holleman

Hollis T. Holleman
Boyce Holleman & Associates, P.A.
1720 23rd Avenue/Bryce Holleman Blvd.
Gulfport, MS 39501
hollis@boyceholleman.com

Counsel for Defendant, Mississippi Gulf Coast Community College

/s/ Keith Altman

Keith Altman, Esq.
Law Office of Keith Altman
33228 West 12 Mile Road, Suite 375
Farmington Hills, MI 48331
keithaltman@kaltmanlaw.com

/s/ James R. Segars

James Russell Segars, III, Esq.
The Diaz Law Firm, PLLC
208 Waterford Square, Suite 300
Madison, MS 39110
tripp@msattorneys.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, the undersigned, of counsel for Defendant, do hereby certify that on this day, I electronically filed the foregoing *Joint Motion for Extension of Time* with the Clerk of the Court using the CM/ECF system which sent notification to the following counsel of record:

Keith Altman, Esq.
Law Office of Keith Altman
33228 West 12 Mile Road, Suite 375
Farmington Hills, MI 48331
keithaltman@kaltmanlaw.com

James Russell Segars, III, Esq.
The Diaz Law Firm, PLLC
208 Waterford Square, Suite 300
Madison, MS 39110
tripp@msattorneys.com

Hollis T. Holleman
Boyce Holleman & Associates
1720 23rd Avenue/Bryce Holleman Blvd.
Gulfport, MS 39501
hollis@boyceholleman.com

/s/ Kristi Rogers Brown
OF COUNSEL

Prepared By:
KRISTI R. BROWN - MS BAR #101989
kbrown@danielcoker.com
DANIEL COKER HORTON AND BELL, P.A.
1712 15TH STREET, SUITE 400
POST OFFICE BOX 416
GULFPORT, MS 39502-0416
TELEPHONE: (228) 864-8117
FACSIMILE: (228) 864-6331